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14 *Attorney for Defendant*

15 **IN THE UNITED STATES DISTRICT COURT**
16 **FOR THE DISTRICT OF ARIZONA**

17 PAMELA C. SULLIVAN,) C.A. NO. 4:13-cv-01166-BGM

18)

19 Plaintiff,)

20)

21)

22)

23 **JOINT SETTLEMENT**
24 **STATUS REPORT**

25)

26 v.)

27)

28)

29 BANK OF AMERICA, NATIONAL)

30 ASSOCIATION,)

31)

32 Defendant.)

33)

34)

35 Plaintiff Pamela C. Sullivan (“PCS”), by and through Jerry S. Smith, PLLC, her
36 undersigned attorney of record, and Defendant Bank of America, National Association (“BOA”),
37 by and through Teri L. Danish, of McGuire Woods, LLP, its undersigned attorney of record,
38 submit this Joint Settlement Status Report, pursuant to the Scheduling Order filed January 29,
39 2014, Dkt. #24, Order G:

40 PCS submitted a written settlement proposal to BOA on May 2, 2014, which BOA has
41 rejected, without any counter-offer. The parties have now completed discovery, but are in the
42 midst of a discovery dispute. The parties have an unresolved discovery dispute wherein the
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1 Plaintiff is seeking certain discovery, as documented by the parties' memoranda filed with the
2 Court, dkt. #61, 62, 63, and 67. This dispute remains largely unresolved, and the Plaintiff will be
3 filing a (first) Motion to Compel Discovery shortly. Once the parties have resolved these issues
4 BOA plans to file a motion for summary judgment.

5 Neither party requests a settlement conference or mediation at this time.

6 Respectfully submitted this 31st day of July 2015.

7 JERRY S. SMITH, PLLC

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9 By: /s/ Jerry S. Smith
JERRY S. SMITH, Attorney for Plaintiff

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11 MC GUIREWOODS LLP

12 By: /s/ Teri L. Danish
TERI L. DANISH, Attorney for Defendant

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14 **CERTIFICATE OF SERVICE**

15 I hereby certify that on July 31, 2015, the foregoing document was duly served in
16 accordance with the provisions of Rule 5 of the Federal Rules of Civil Procedure.

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/s/ Teri L. Danish
TERI L. DANISH